

1 **SAO**  
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12 *Attorneys for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**  
8 **CLARK COUNTY, NEVADA**

9 CHELSEA ROBERTS, individually, and as heir of  
10 deceased G.E.D.; CHELSEA ROBERTS as the  
11 parent and legal guardian on behalf of G.E.D.,  
12 deceased minor child; CHELSEA ROBERTS, as  
the parent and legal guardian of J.E.D., a minor,  
individually and as heir of MICHAEL DURMEIER,

13 Plaintiffs,

14 vs.

15 NYE COUNTY SHERIFF'S OFFICE, a subdivision  
16 of the STATE OF NEVADA; DEPARTMENT OF  
17 PUBLIC SAFETY, DIVISION OF NEVADA  
18 HIGHWAY PATROL, a political subdivision of the  
19 STATE OF NEVADA; BUREAU OF LAND  
20 MANAGEMENT, a political subdivision of the  
21 STATE OF NEVADA; NYE COUNTY DEPUTY  
22 BREANNA NELSON; BUREAU OF  
23 LANDMANAGEMENT OFFICER RYAN  
24 GALLAGHER; NYE COUNTY LIEUTENANT  
25 ALAN W. SCHRIMPF; NYE COUNTY  
26 DETECTIVE BROOKE GENTRY; NYE COUNTY  
27 DEPUTY MICHAEL MOKESKI; NYE COUNTY  
28 TRAINEE ISAAC CHAMPLIN; NYE COUNTY  
DETECTIVE DANIEL FISCHER; NEVADA  
HIGHWAY PATROL TROOPER LUKE STANG;  
NYE COUNTY, a County of State of Nevada; DOE  
OFFICERS, AGENTS, or the like I through X,  
inclusive; and ROE CORPORATIONS I through X,  
inclusive, ROE AGENCIES OR POLITICAL  
SUBDIVISIONS I -X,

Defendants.

Case No.: 2:22-cv-00398-RFB-EJY

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING BRIEFING  
SCHEDULE ON DEFENDANT LUKE  
STANG AND THE NEVADA  
HIGHWAY PATROL'S MOTION TO  
DISMISS THE AMENDED  
COMPLAINT IN PART**

1 IT IS HEREBY STIPULATED by and between the parties hereto, Plaintiffs, CHELSEA  
2 ROBERTS, individually, and as heir of deceased G.E.D.; CHELSEA ROBERTS as the parent  
3 and legal guardian on behalf of G.E.D., deceased minor child; CHELSEA ROBERTS, as the  
4 parent and legal guardian of J.E.D., a minor, individually and as heir of MICHAEL  
5 DURMEIER, by and through their undersigned counsel, THE 702 FIRM, and Defendants,  
6 LUKE STANG and THE NEVADA HIGHWAY PATROL, by and through their undersigned  
7 counsel of record, OFFICE OF THE ATTORNEY GENERAL, that the briefing schedule,  
8 regarding Defendants Luke Stang and The Nevada Highway Patrol's Motion To Dismiss The  
9 Amended Complaint In Part.

10 The parties, through their undersigned counsel, hereby stipulate and agree as follows:

11 WHEREAS, on March 25, 2022, Defendants Luke Stang and The Nevada Highway  
12 Patrol filed their Motion to Dismiss the Amended Complaint in Part ("Motion");

13 Plaintiffs' undersigned counsel requested additional time to prepare their opposition to  
14 Defendants' Motions from Defendants and Defendants agreed;

15 NOW, therefore, the parties hereby STIPULATE that Plaintiffs' Opposition to  
16 Defendants Luke Stang and The Nevada Highway Patrol's Motion to Dismiss the Amended  
17 Complaint in Part will be due April 22, 2022 and Defendants' Reply will be due May 6, 2022.

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**IT IS SO STIPULATED.**

<p>DATED this 1<sup>st</sup> day of April, 2022.</p> <p><b>THE702FIRM</b></p> <p><i>/s/ Michael Kane</i></p> <hr/> <p>MICHAEL C. KANE, ESQ. Nevada Bar No.: 10096 BRADLEY J. MYERS, ESQ. Nevada Bar No.: 8857 400 S. 7<sup>th</sup> Street, Suite/Floor 4 Las Vegas, Nevada 89101 E-Mail: <a href="mailto:service@the702firm.com">service@the702firm.com</a> <i>Attorneys for Plaintiffs</i></p>	<p>DATED this 1<sup>st</sup> day of April, 2022.</p> <p><b>OFFICE OF THE ATTORNEY GENERAL</b></p> <p><i>/s/ Jared Frost</i></p> <hr/> <p>AARON D. FORD Attorney General JARED M. FROST, ESQ. Nevada Bar No. 11132 Senior Deputy Attorney General 555 E. Washington Ave., Ste. 3900 Las Vegas, NV 89101 <i>Attorneys for Defendants Nevada Highway Patrol and Nevada Highway Patrol Trooper Luke Stang</i></p>
<p>DATED this 1<sup>st</sup> day of April, 2022.</p> <p><b>THE SIMON LAW GROUP</b></p> <p><i>/s/ Greyson Goody</i></p> <hr/> <p>GREYSON M. GOODY, ESQ. California Bar No. 292527 (<i>admitted pro hac vice</i>) 34 Hermosa Avenue Hermosa Beach, CA 90254 <i>Attorney for Plaintiffs</i></p>	

**ORDER**

IT IS SO ORDERED this 5th day of April, 2022.

  
**RICHARD E. BOULWARE, II**  
**United States District Court**